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U.S. DISTRICT COURT, E.D.N.Y.
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April 11, 2008

VIA FEDERAL EXPRESS

Clerk of the Panel
Judicial Panel on Multi-District Litigation
Thurgood Marshall Federal Judiciary Building
One Columbus Circle, N.E.
Room G-255, North Lobby
Washington, D.C. 20002-8004

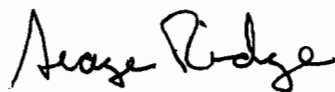
Re: Title Insurance Real Estate Settlement Procedures Act
(RESPA) and Antitrust Litigation: MDL No. 1951
Castro v. Chicago Title Insurance Co., Our Matter No. 08028

Dear Clerk of the Panel:

We write on behalf of our client, Lourdes Castro.

Pursuant to Rules 5.12, 5.13 and 7.2(c), Rules of Procedure of the Judicial Panel on Multi-District Litigation, please find enclosed one original, four paper copies, and one electronic copy on a computer-readable disk of: (1) Plaintiff, Lourdes Castro's Memorandum of Law in Response to Plaintiffs, Gerry Galiano, Gary Kromer, Monique Kromer, Joseph Ammirati, Michelle Ammirati and Susan Marotta's Motion for Transfer of Actions to Southern District of New York Pursuant to 28 U.S.C. § 1407 for Coordinated or Consolidated Pretrial Proceedings; and (2) Certificate of Service on April 11, 2008.

Respectfully submitted,



George E. Ridge

GER:tds
Enclosures

**BEFORE THE JUDICIAL PANEL
ON MULTIDISTRICT LITIGATION**

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	:	
IN RE TITLE INSURANCE REAL ESTATE	:	
SETTLEMENT PROCEDURES ACT	:	MDL Docket No. 1951
(RESPA) AND ANTITRUST LITIGATION	:	
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**PLAINTIFF, LOURDES CASTRO'S MEMORANDUM OF LAW
IN RESPONSE TO PLAINTIFFS, GERRY GALIANO, GARY KROMER,
MONIQUE KROMER, JOSEPH AMMIRATI, MICHELLE AMMIRATI,
AND SUSAN MAROTTA MOTION FOR TRANSFER OF ACTIONS
TO THE SOUTHERN DISTRICT OF NEW YORK
FOR COORDINATED OR CONSOLIDATED PRETRIAL PROCEEDINGS**

Plaintiff, Lourdes Castro ("Castro"),¹ hereby respectfully submits this Memorandum of Law in Response to Plaintiffs, Gerry Galiano, Gary Kromer, Monique Kromer, Joseph Ammirati, Michelle Ammirati and Susan Marotta's (collectively "Galiano") Motion for Transfer of Actions to Southern District of New York Pursuant to 28 U.S.C. § 1407 for Coordinated or Consolidated Pretrial Proceedings. Castro adopts and incorporates the arguments contained in Plaintiff, Lucien Gougeon's ("Gougeon") Response and Memorandum of Law submitted to the Panel on April 11, 2008 as fully set forth herein.

¹ On April 3, 2008, Plaintiff Lourdes Castro, a resident of Norfolk County, Massachusetts, filed an action in the United States District Court for the Middle District of Florida, styled Castro v. Chicago Title Insurance Co., Case No. 3:08-cv-336-J-16TEM.

Castro requests that the Judicial Panel on Multi-District Litigation (“Panel”) deny Galiano’s motion to transfer all related matters to the United States District Court for the Southern District of New York (S.D.N.Y.), and instead issue an Order transferring all related matters to the United States District Court for the Middle District of Florida , Jacksonville Division.

The Fidelity family of title insurance companies (collectively, “Fidelity”) include Defendants Fidelity National Finance, Inc. (“Fidelity National”), and its wholly-owned subsidiaries, Chicago Title Insurance Company (“Chicago Title”), Fidelity National Title Insurance Company (“Fidelity Title”), and Ticor Title Insurance Company (“Ticor Title”), all of which are corporations headquartered and maintaining the principal place of business in Jacksonville, Florida. The Fidelity Defendants and their affiliates sell title insurance to purchasers of commercial and residential real estate throughout the United States, including Alabama, Arkansas, California, Georgia, Illinois, Indiana, Massachusetts, Mississippi, New York, Oklahoma, Pennsylvania, Virginia, West Virginia and the District of Columbia. Nationally, Fidelity accounts for the underwriting of approximately 27 percent of title insurance policies, which in 2006, amounted to roughly \$4.6 billion in premiums.

The Fidelity Defendants account for four of the twelve named Defendants in the Castro v. Chicago Title Insurance Company litigation. The Fidelity Defendants set and controlled title insurance rates from their offices in Jacksonville, Florida, which are the hub of Fidelity’s nationwide network of direct operations and agents. Accordingly, it is respectfully submitted that the Middle District of Florida is the most appropriate forum for the consolidated and coordinated pretrial proceedings of all related actions in this matter. In summary:

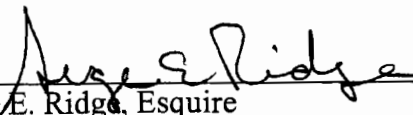
- A significant portion of the acts charged in the subject complaints occurred in Jacksonville, Florida;

- Discovery efforts directed to approximately one-third of the Defendants named in these actions, such as document production and depositions, will be directed to Jacksonville, Florida;
- The Middle District of Florida, Jacksonville Division, is easily utilized as a MDL transferree forum with few currently pending MDL cases and sufficient judicial resources to support such litigation.

WHEREFORE, Plaintiff Lourdes Castro respectfully requests that the Panel enter an Order denying Plaintiffs Gerry Galiano, Gary Kromer, Monique Kromer, Joseph Ammirati, Michelle Ammirati and Susan Marotta's Motion for Transfer of Actions to Southern District of New York, and instead transferring all actions related to this matter to the United States District Court for the Middle District of Florida, Jacksonville Division, for consolidated or coordinated proceedings.

Dated: April 11, 2008
Jacksonville, Florida

COOPER, RIDGE AND LANTINBERG, P.A.



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**BEFORE THE JUDICIAL PANEL
ON MULTIDISTRICT LITIGATION**

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IN RE TITLE INSURANCE REAL ESTATE	:	
SETTLEMENT PROCEDURES ACT	:	MDL Docket No. 1951
(RESPA) AND ANTITRUST LITIGATION	:	
	:	
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CERTIFICATE OF SERVICE

I, George E. Ridge, hereby certify that the following document:

1. Plaintiff, Lourdes Castro's Memorandum of Law in Response to Plaintiffs, Gerry Galiano, Gary Kromer, Monique Kromer, Joseph Ammirati, Michelle Ammirati and Susan Marotta's Motion for Transfer of Actions to the Southern District of New York for Coordinated or Consolidated Pretrial Proceedings

has been sent via first class mail to the following:

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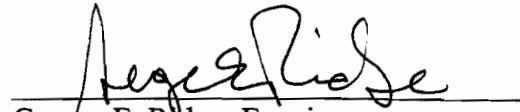
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Dated: April 11, 2008
Jacksonville, Florida

COOPER, RIDGE AND LANTINBERG, P.A.

A handwritten signature in black ink, appearing to read "George E. Ridge", is written over a horizontal line.

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